

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

STEVEN HOELZER,)	CASE NO:1:20-CV-00154
)	
Plaintiff,)	
)	JUDGE SOLOMON OLIVER, JR.
v.)	
)	MAGISTRATE JUDGE JONATHAN
SAINT-GOBAIN CORPORATION,)	GREENBERG
)	
Defendant.)	<u>DEFENDANT'S MOTION TO</u>
)	<u>EXCUSE CLIENT</u>
)	<u>REPRESENTATIVE FROM</u>
)	<u>PERSONAL ATTENDANCE AT THE</u>
)	<u>CASE MANAGEMENT</u>
)	<u>CONFERENCE</u>

Defendant Saint-Gobain Corporation, by and through counsel, hereby moves this Honorable Court for an order excusing Defendant's corporate representative from appearing in person at the Case Management Conference (the "Conference") scheduled for March 27, 2020 at 11:00 a.m.

The Case Management Conference Scheduling Order requires the attendance of parties, defining parties in the case of a legal entity as "that person who is most familiar with the actual facts of the case" and lead counsel. Defendant's representative in this matter is located in Pennsylvania and travel is currently restricted by her employer due to the Coronavirus. Defendant respectfully requests that Defendant's representative be permitted to participate in the Conference by telephone, while Defendant's lead counsel will attend the conference in person, assuming the Court remains open. Defendant is also amenable to having all counsel, parties, and the Court participate by telephone.

This request will not prejudice either party to this action. For the foregoing reasons and for good cause having been shown, Defendant respectfully requests that the Court grant this motion to excuse Defendant's representative from personal appearance at the Conference.

Respectfully submitted,

/s/ Rebecca J. Bennett

Rebecca J. Bennett (0069566)

Samuel H. Ottinger (0099034)

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

Key Tower

127 Public Square, Suite 4100

Cleveland, OH 44114

216-241-6100

216-357-4733 (FAX)

Email: rebecca.bennett@ogletree.com

samuel.ottinger@ogletree.com

*Attorneys for Defendant Saint-Gobain
Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2020, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Rebecca J. Bennett
One of the Attorneys for Defendant Saint-Gobain Corporation

42081664.1